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October 12, 2001

Alison Hess/Douglas Tomchuk
Hudson River PCBs Public Comment
U.S. Environmental Protection Agency
Region II
290 Broadway, 19th Floor
New York, NY 10007-1866

Re: Supplemental Comments of General Electric Company on the Feasibility Study and Proposed Plan for the Hudson River PCBs Superfund Site

Dear Ms. Hess and Mr. Tomchuk:

The April 17, 2001 Comments of General Electric Company ("GE") on the Feasibility Study and Proposed Plan for the Hudson River PCBs Superfund Site included projections of the impact of re-suspension of PCBs during dredging. See, e.g., Sections II.C.2 and II.D, Figures II-2 through II-12, and Appendix A of GE's Comments. These modeling projections were based on the estimates of the amount of PCB in the sediments for each river section contained in Table 6-3 of the EPA Feasibility Study.

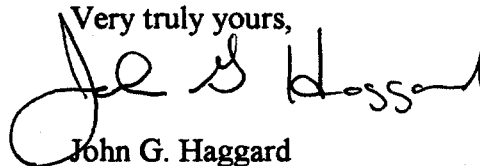
We have discovered that Table 6-3 of the Feasibility Study displayed inconsistent information -- the PCB mass shown in Section 1 reflects only PCBs with three or more chlorine atoms (tri + PCB), whereas the PCB amounts reported for Sections 2 and 3 reflect total PCBs. Throughout the study period, generally, only tri+ PCB levels have been the focus of presentations. Both the GE and EPA models simulate only tri+ PCBs. As a result, our comments assumed that estimates in Table 6-3 of the EPA Feasibility Study were also presentations of tri+ PCB levels. Attached to this letter are several supplementary figures reflecting re-suspension estimates using only tri+ PCBs.

The updated calculations do not change the conclusions presented in GE's Comments: even minimal amounts of re-suspension of PCBs will cause increases in the PCB levels in fish and water; increase the amount of PCBs which leave the upper river and are released into the lower river compared to source control alone. In other words, it remains true that the negative consequences of EPA's proposed plan greatly outweigh its perceived benefits.

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Please place this letter in the Administrative Record for the Site. We are prepared to clarify or discuss any of the matters raised by these Supplemental Comments and figures with you at any mutually convenient time.

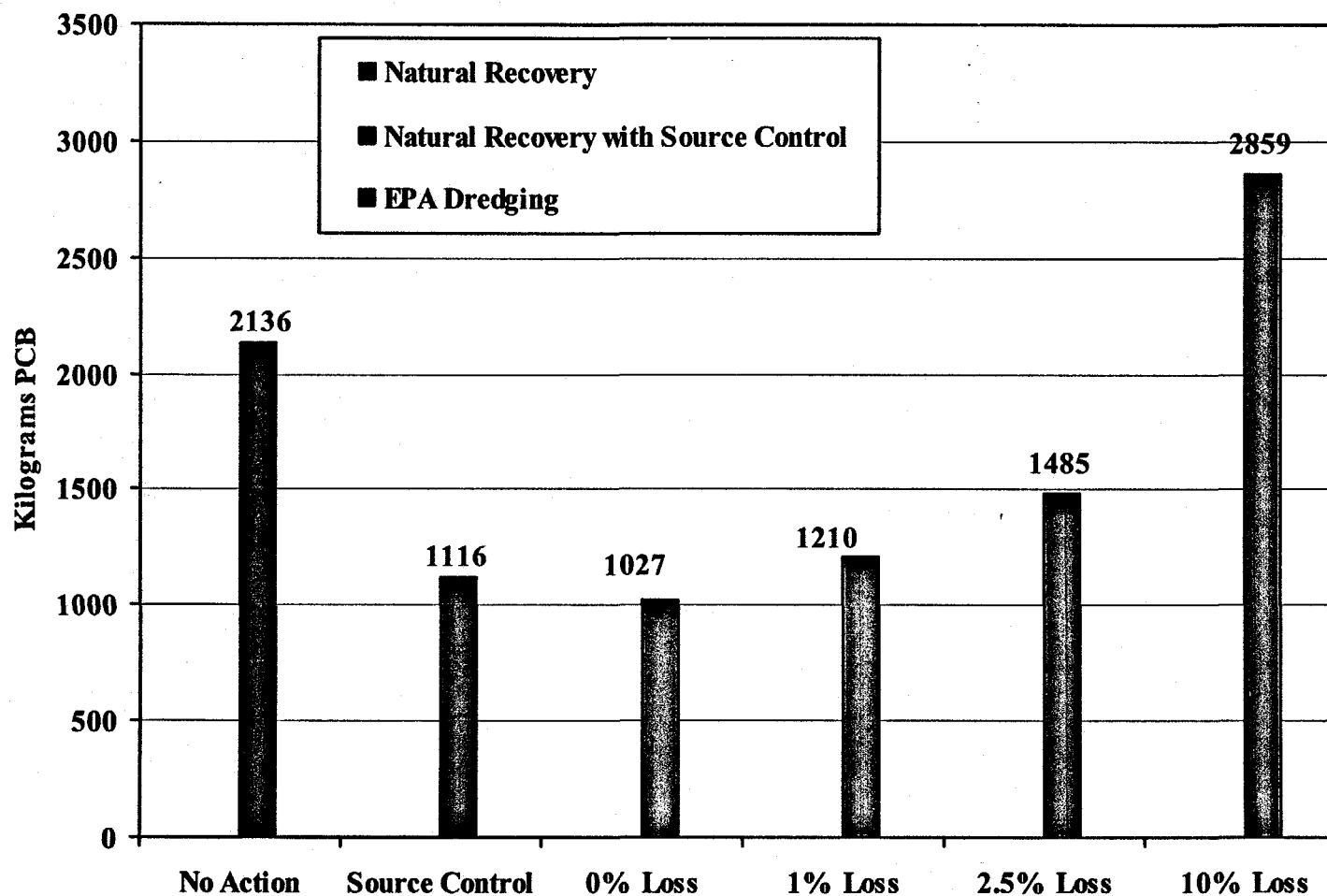
Very truly yours,

A handwritten signature in dark ink, appearing to read "John G. Haggard". The signature is fluid and cursive, with a large initial "J" and "H".

John G. Haggard

cc: Erin Crotty, Commissioner NYSDEC
Michael O'Toole, Director Hazardous Waste Division, NYSDEC
William Muszynski, Acting Regional Administrator, U.S. EPA Region 2
Richard Caspe, Director Superfund, U.S. EPA Region 2

Cumulative Load (2004-2035) to the Lower Hudson River - GE Model

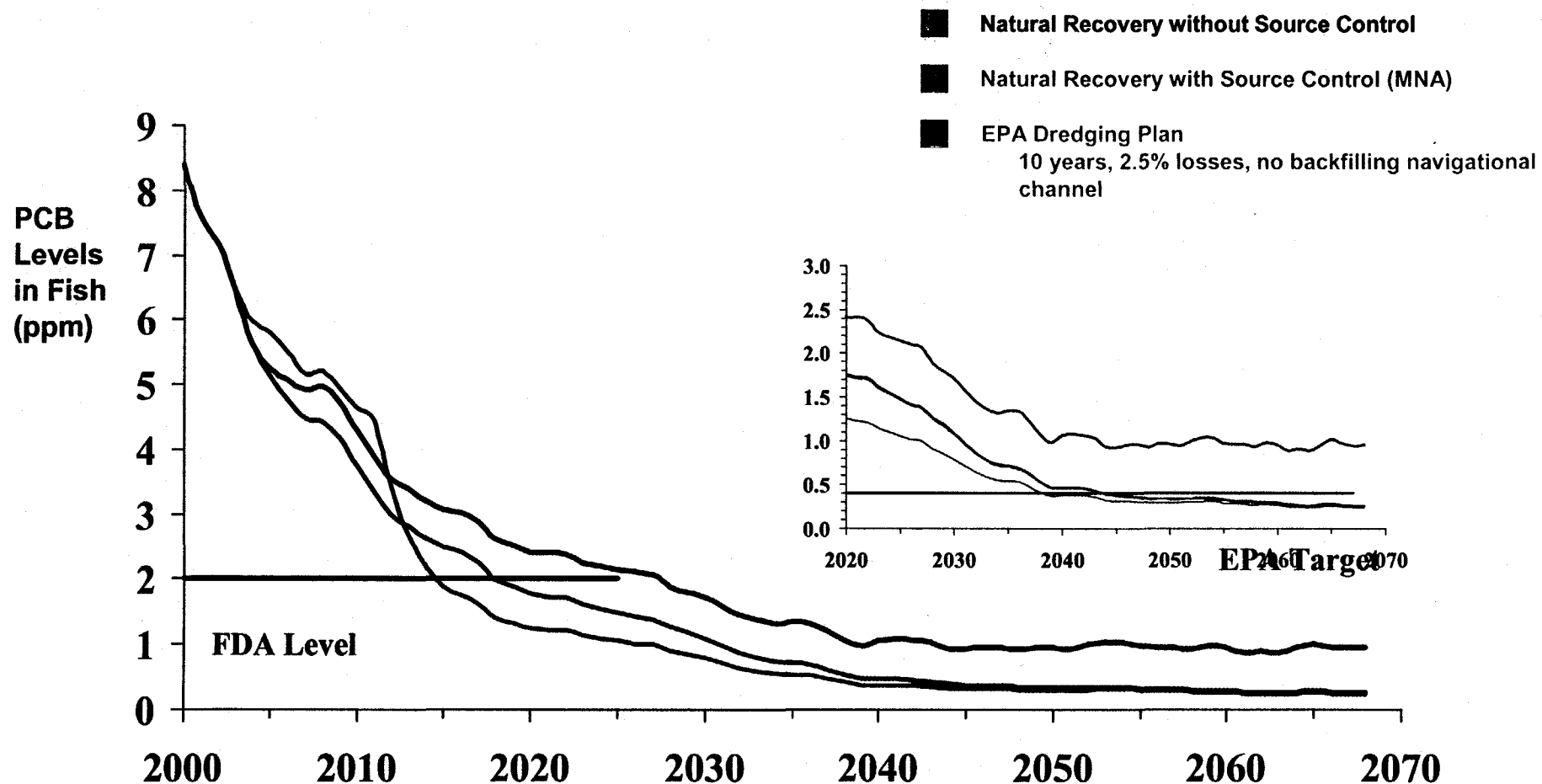


Note that EPA dredging dredging plan uses realistic assumptions (duration of 10 years and no backfilling navigational channel). Percent PCB₃₊ loss is indicated by x-axis label. PCB release via resuspension based on tri+ mass targeted for dredging.

GE Model Prediction for River Section 2

Assuming Dredging Releases 2.5% of PCBs & EPA Plan Takes 10 Years:

Species-Weighted PCB Concentrations in Fish from Thompson Island Dam to Northumberland Dam
(Section 2) Projected Under Natural Recovery with and without Source Control and Dredging Scenarios

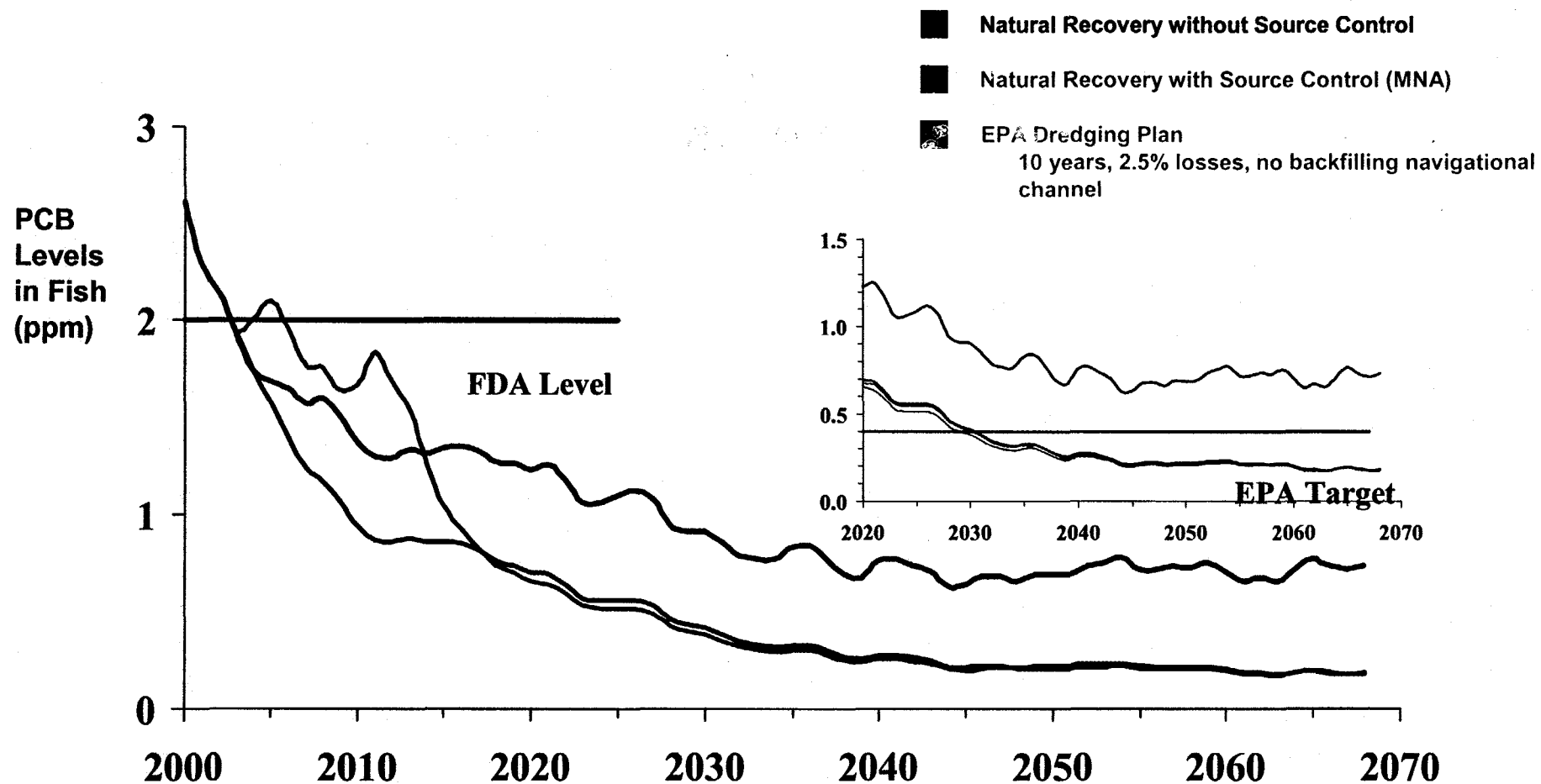


Note that PCB release via resuspension based on tri+ mass targeted for dredging.

GE Model Prediction for River Section 3

Assuming Dredging Releases 2.5% of PCBs & EPA Plan Takes 10 Years:

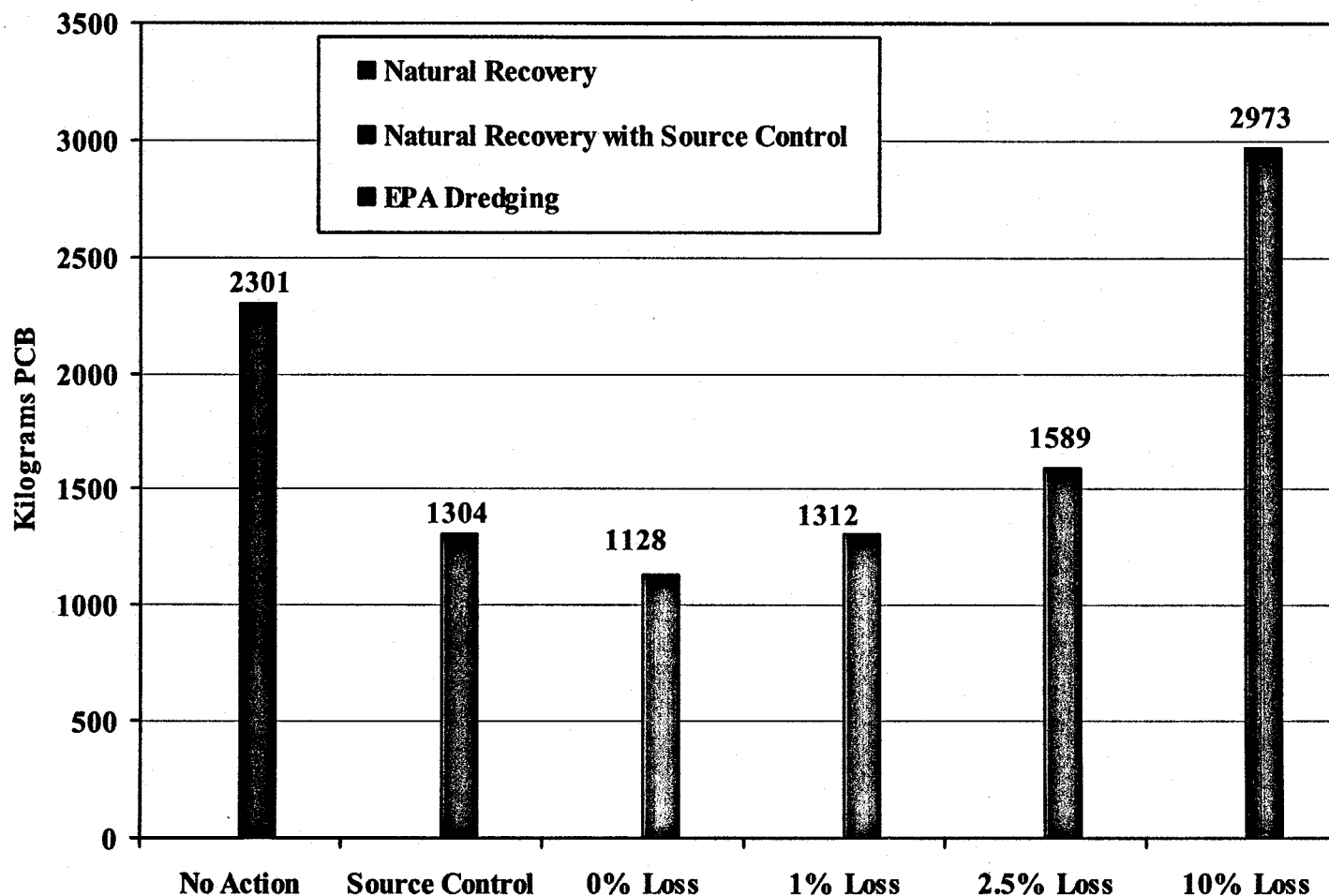
Species-Weighted PCB Concentrations in Fish from Northumberland Dam to Troy Dam (Section 3)
Projected Under Natural Recovery with and without Source Control and Dredging Scenarios



Note that PCB release via resuspension based on tri+ mass targeted for dredging.

EPA Model Prediction

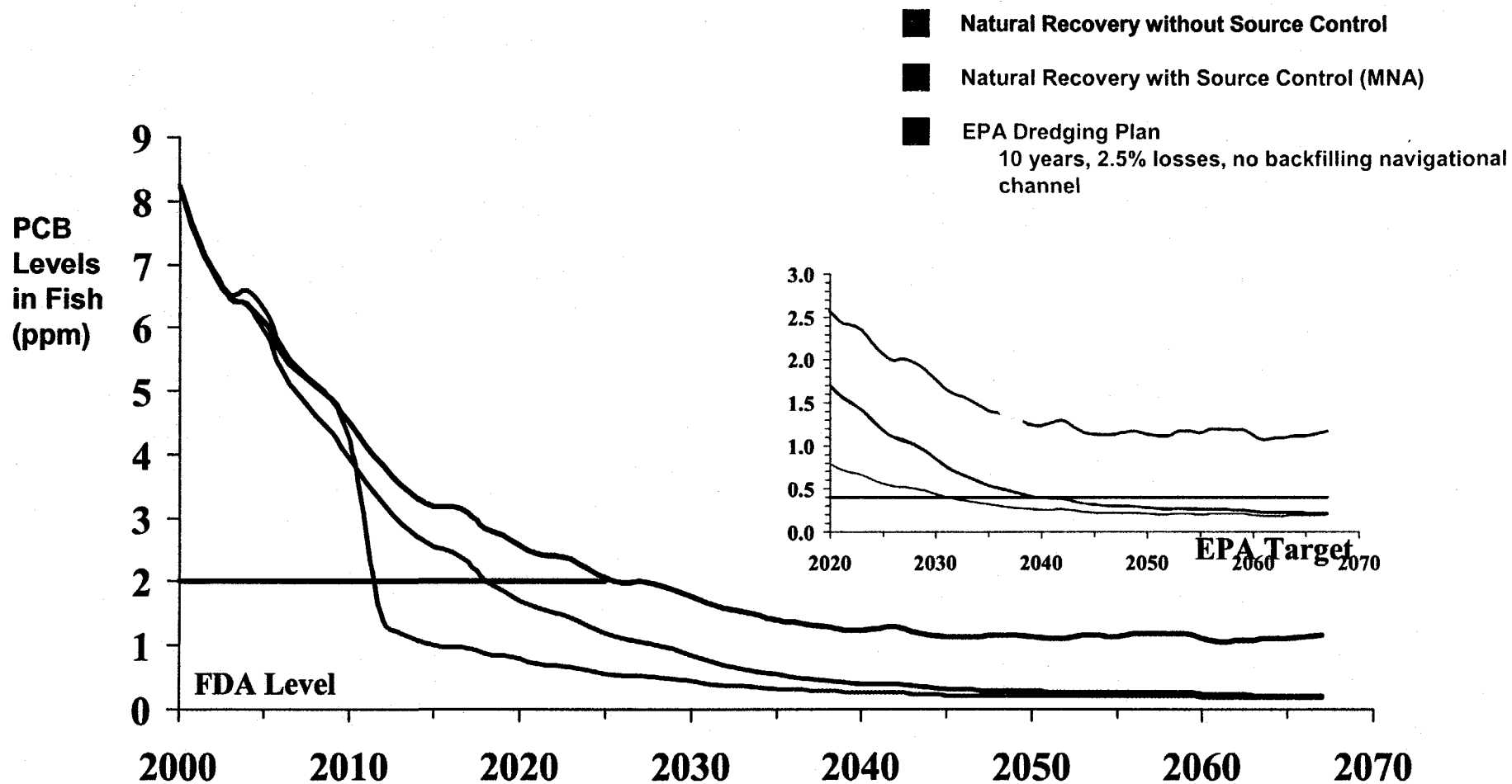
Cumulative Load (2004-2035) to the Lower Hudson River - EPA Model



Note that EPA dredging dredging plan uses realistic assumptions (duration of 10 years and no backfilling navigational channel). Percent PCB₃₊ loss is indicated by x-axis label. PCB release via resuspension based on tri+ mass targeted for dredging.

Assuming Dredging Releases 2.5% of PCBs & EPA Plan Takes 10 Years:

**Species-Weighted PCB Concentrations in Fish from Thompson Island Dam to Northumberland Dam
(Section 2) Projected Under Natural Recovery with and without Source Control and Dredging Scenarios**



Note that PCB release via resuspension based on tri+ mass targeted for dredging.